

ST. GREGORY CATHEDRAL SCHOOL
and ADK QUARTER MOON, LLC, on behalf
of themselves and all others similarly situated,

Case No. 6:12-CV-739

LG ELECTRONICS, INC., a South Korean corporation, and LG ELECTRONICS U.S.A., INC., a Delaware corporation,

DEFENDANT LG ELECTRONICS U.S.A., INC.’S
CONSENT MOTION TO SEAL PLAINTIFFS’ AMENDED COMPLAINT

On December 26, 2012, counsel for LGE USA in *Cottage Builders* notified Plaintiffs’ Counsel of this inadvertent production. On the same day, counsel for LGE USA in *Cottage Builders* also filed a motion in *Cottage Builders* requesting that they be allowed to designate this

inadvertently produced material as confidential pursuant to the terms of the protective order entered in *Cottage Builders*.¹

Following discussions among counsel in this case, the parties have agreed to request that the Court enter an order sealing the Amended Complaint and its exhibits. The parties therefore request that the Court enter an order directing the clerk to seal the Amended Complaint and its exhibits and to keep the Amended Complaint and exhibits confidential. A proposed order granting this request is attached as Exhibit A.

DATED this 27th of December, 2012.

Respectfully submitted,

/s/ Jonathan Chally

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***COUNSEL FOR LG ELECTRONICS U.S.A.,
INC.***

¹ This protective order was attached to Plaintiffs' Amended Complaint (Doc. No. 22-4.).

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LG ELECTRONICS, INC., a South Korean corporation, and LG ELECTRONICS U.S.A., INC., a Delaware corporation,

CERTIFICATE OF SERVICE

Dated: December 27, 2012

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ST. GREGORY CATHEDRAL SCHOOL	:	
and ADK QUARTER MOON, LLC, on behalf	:	
of themselves and all others similarly situated,	:	
	:	
Plaintiffs,	:	Case No. 6:12-CV-739
	:	
v.	:	
	:	
LG ELECTRONICS, INC., a South Korean	:	
corporation, and LG ELECTRONICS U.S.A.,	:	
INC., a Delaware corporation,	:	
	:	
Defendants	:	

CERTIFICATE OF CONFERENCE

I hereby certify that, in connection with LG Electronics U.S.A., Inc.'s consent motion to seal Plaintiffs' Amended Complaint, counsel has complied with the meet and confer requirement in Local Rule CV-7(h), and this motion is unopposed.

Dated: December 27, 2012

/s/ Jonathan Chally _____
Jonathan Chally